

UNITED STATES DISTRICT COURT

for the

Central District of California



BLENDERS EYEWEAR, LLC

)

)

)

)

*Plaintiff(s)*

v.

Civil Action No.

LE VENTURES, LLC, a California limited liability company; LE VENTURES, LLC, a Nevada limited liability company; NEVEN EYEWEAR LLC, a Nevada limited liability company; (see Attachment #1)

)

)

)

*Defendant(s)*

)

**SUMMONS IN A CIVIL ACTION**

To: *(Defendant's name and address)* LE VENTURES, LLC, a California limited liability company  
8605 Santa Monica Blvd #84045  
Los Angeles, CA 90069

LE VENTURES, LLC, a Nevada limited liability company  
187 E. Warm Springs Road Suite B  
Las Vegas, NV 89118  
(See attachment #2)

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Gregory M. Krakau  
Krakau Law, P.C.  
100 Pine Street, Suite 1250  
San Francisco, CA 94111

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

*CLERK OF COURT*

Date: \_\_\_\_\_

*Signature of Clerk or Deputy Clerk*

---

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

**(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))**

This summons for (*name of individual and title, if any*) \_\_\_\_\_  
was received by me on (*date*) \_\_\_\_\_.

I personally served the summons on the individual at (*place*) \_\_\_\_\_  
on (*date*) \_\_\_\_\_; or

I left the summons at the individual's residence or usual place of abode with (*name*) \_\_\_\_\_,  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on (*date*) \_\_\_\_\_, and mailed a copy to the individual's last known address; or

I served the summons on (*name of individual*) \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of (*name of organization*) \_\_\_\_\_  
on (*date*) \_\_\_\_\_; or

I returned the summons unexecuted because \_\_\_\_\_; or

Other (*specify*): \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00 \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

## Attachment # 1 to Summons

KRAKAU LAW, P.C.  
Gregory M. Krakau, Bar No. 248607  
100 Pine Street, Suite 1250  
San Francisco, California 94111  
Telephone: (415) 936-2400  
Facsimile: (415) 936-2401  
Email: [greg@krakaulaw.com](mailto:greg@krakaulaw.com)

Attorneys for Plaintiff  
**BLENDERS EYEWEAR, LLC**

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

**BLENDERS EYEWEAR, LLC, a Delaware limited liability company,**

**Plaintiff,**

V.

LE VENTURES, LLC, a California limited liability company; LE VENTURES, LLC, a Nevada limited liability company; NEVEN EYEWEAR LLC, a Nevada limited liability company; NEVEN EYEWEAR, LLC, a Florida limited liability company; NEVEN HOLDINGS, LLC, a Florida limited liability company; 37 VENTURES, LLC, a Nevada limited liability company; LE VENTURES HOLDING, INC., a Nevada corporation; Khoi Le, an individual residing in California; Suzanne Elizabeth Connelly, an individual residing in Nevada; William L. Potts, an individual residing in Nevada; Jonathan Strauss, an individual residing in Florida; and DOES 1 through 10, inclusive.

## Defendants.

**Case No.**

## **COMPLAINT FOR:**

- (1) TRADEMARK INFRINGEMENT -- 15  
U.S.C. §§ 1114 AND 1125(a);
- (2) UNFAIR COMPETITION AND FALSE  
DESIGNATION OF ORIGIN – 15  
U.S.C. 1125(a);
- (3) UNFAIR COMPETITION AND  
UNFAIR BUSINESS PRACTICES –  
CAL. BUS. & PROF. CODE §§ 17200  
AND 17500, ET SEQ.;
- (4) STATE TRADEMARK DILUTION  
AND INJURY TO BUSINESS  
REPUTATION – CAL. BUS. & PROF.  
CODE §§ 14330;
- (5) COMMON LAW TRADEMARK  
INFRINGEMENT; and
- (6) COMMON LAW UNFAIR  
COMPETITION

## **DEMAND FOR JURY TRIAL**

Plaintiff BLENDERS EYEWEAR, LLC (“Blenders Eyewear” or “Blenders” or “Plaintiff”) complains and alleges against LE VENTURES, LLC, a California limited liability company; LE VENTURES, LLC, a Nevada limited liability company; NEVEN EYEWEAR

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

BLENDERS EYEWEAR, LLC. v. LE VENTURES, LLC et al.  
[Case No.]

ATTACHMENT #2 TO SUMMONS

**DEFENDANTS TO BE SERVED:**

LE VENTURES, LLC  
8605 Santa Monica Blvd #84045  
Los Angeles, CA 90069

LE VENTURES HOLDING, INC.  
5940 S Rainbow Blvd Ste 400  
Las Vegas, NV 89118

LE VENTURES, LLC  
187 E. Warm Springs Road Suite B  
Las Vegas, NV 89118

Khoi Le  
8605 Santa Monica Blvd #84045  
Los Angeles, CA 90069

NEVEN EYEWEAR LLC  
5940 S Rainbow Blvd Ste 400 #84045  
Las Vegas, NV 89118

Suzanne Elizabeth Connelly  
187 E. Warm Springs Road Suite B  
Las Vegas, NV 89118

NEVEN EYEWEAR, LLC  
225 5<sup>th</sup> Avenue, Ste 1  
Indialantic, Florida 32903

William L. Potts  
187 E. Warm Springs Road Suite B  
Las Vegas, NV 89118

NEVEN HOLDINGS, LLC  
870 N. Miramar Ave., #391  
Indialantic, FL 32903

Jonathan Strauss  
139 Cambridge Court  
Indialantic, FL 32903

37 VENTURES, LLC  
5940 S Rainbow Blvd Ste 400 #84045  
Las Vegas, NV 89118